

# **Exhibit 2**

## **Part 1 of 3**

Payment must be made by Certified Check, Cashier's Check, Illinois Attorney's Check, Illinois C.P.A.'s Check or Money Order, payable to "Secretary of State."  
 DO NOT SEND CASH! Filing Fee \$50 Approved

**PAID**

MAR 30 1992

TO: GEORGE H. RYAN, Secretary of State

Pursuant to the provisions of "The General Not For Profit Corporation Act of 1986", the undersigned incorporator(s) hereby adopt the following Articles of Incorporation.

Article 1. The name of the corporation is: Benevolence International Foundation

Article 2. The name and address of the initial registered agent and registered office are:

Registered Agent Soliman J. Khudeira  
 First Name Middle Name Last Name  
 Registered Office 7810 S. Mayfield Avenue  
 Number Street (Do Not Use P.O. Box)  
Hurbank, IL IL 60459 Cook  
 City Zip Code County

Article 3. The first Board of Directors shall be three in number, their names and addresses being as follows:  
 (Not less than three)

Director's Names	Number	Street	Address City	State
Adel Abdul Jalil Batterjee Helmi Kutbi, Jeddah Saudi Arabia				SA
Shahir Abdulraoof Batterjee El Segafh, Jeddah Saudi Arabia				SA
Mazin M.S. Bahareth Abdul Rahman Alsideri, Jeddah Saudi Arabia				SA

WAMY's Chairman in S.A. CA, AZ (1992)

Article 4. The purposes for which the corporation is organized are:

SEE ATTACHED STATEMENT

Shimire American Council

Is this corporation a Condominium Association as established under the Condominium Property Act?  
☐ Yes ☒ No (Check one)  
 Is this corporation a Cooperative Housing Corporation as defined in Section 216 of the Internal Revenue Code of 1954?  
☐ Yes ☒ No (Check one)  
 Is this a Homeowner's Association which administers a common-interest community as defined in subsection (c) of Section 9-102 of the code of Civil Procedure?  
☐ Yes ☒ No

Article 5. Other provisions (please use separate page):

577-845-4

1-800-555-1212

0000 0000 1797

Form 1023 (Rev. 9-90)

**Part III Activities and Operational Information**

1. Provide a detailed narrative description of all the activities of the organization—past, present, and planned. Do not merely refer to or repeat the language in your organizational document. Describe each activity separately in the order of importance. Each description should include, as a minimum, the following: (a) a detailed description of the activity including its purpose; (b) when the activity was or will be initiated; and (c) where and by whom the activity will be conducted.

Operations have not yet begun. Directors are waiting for exempt status.

Benevolence International Foundation has been organized to provide money and services to those who are in need. The founders of the organization intend to provide support for educational and medical institutions that service the needy. The organization intends to give money to those organizations that are truly in need of funding. Initially, the directors will ask religious organizations to suggest possible donees. The founders estimate that they will each contribute \$5,000 to the organization in order that the organization has the necessary means to attract other supporters. None of the directors shall receive compensation for their services. A minimal amount of operating expenses (i.e., office supplies, postage, telephone, professional fees, etc.) are expected to be incurred. Initial operations are expected to begin by July 1, 1992. The foundation, however, would like to begin operations approximately the same time as its operations in Canada begin.

The Foundation is currently applying for similar status in Canada. Mr. Farouq Maial, LLB at 38 Sweetland Avenue in Ottawa, Canada is handling all of the legal work necessary for the foundation to operate in Canada.

The founders of the organization live abroad, but travel to the United States on a regular basis. In their absence, Mr. Soliman U. Khudaira, a resident of Burbank, Illinois, handles all matters.

See 1-101

EO Determination Unit

2. What are or will be the organization's sources of financial support? List in order of size.

The organization's sources of financial support will be from its members and from friends as well as from fund raising activities.

3. Describe the organization's fundraising program, both actual and planned, and explain to what extent it has been put into effect. Include details of fundraising activities such as selective mailings, formation of fundraising committees, use of volunteers or professional fundraisers, etc. Attach representative copies of solicitations for financial support.

The organization intends to have fund raising by using mass mailings and other direct marketing methods.



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**Part VII Activities and Operational Information (Continued)****4 Give the following information about the organization's governing body:****a** Names, addresses, and titles of officers, directors, trustees, etc.**b** Annual Compensation

- |                               |                        |      |
|-------------------------------|------------------------|------|
| 1. Adel Abdul Jalil Batterjee | 3. Mazin M.S. Bahareth | NONE |
| Helmi Kutbi                   | Abdul Rahman Alsideri  |      |
| Jeddah Saudi Arabia           | Jeddah Saudi Arabia    |      |
| 2. Shahr Abdulraoof Batterjee |                        |      |
| El Seqafh                     |                        |      |
| Jeddah Saudi Arabia           |                        |      |

**c** Do any of the above persons serve as members of the governing body by reason of being public officials or being appointed by public officials?☐ Yes ☒ No

If "Yes," name those persons and explain the basis of their selection or appointment.

**d** Are any members of the organization's governing body "disqualified persons" with respect to the organization (other than by reason of being a member of the governing body) or do any of the members have either a business or family relationship with "disqualified persons"? (See the specific instructions for line 4d.)☐ Yes ☒ No

If "Yes," explain.

**5** Does the organization control or is it controlled by any other organization?☐ Yes ☒ No

Is the organization the outgrowth of (or successor to) another organization, or does it have a special relationship with another organization by reason of interlocking directorates or other factors?

☐ Yes ☒ No

If either of these questions is answered "Yes," explain.

**6** Does or will the organization directly or indirectly engage in any of the following transactions with any political organization or other exempt organization (other than 501(c)(3) organizations): (a) grants; (b) purchases or sales of assets; (c) rental of facilities or equipment; (d) loans or loan guarantees; (e) reimbursement; (f) arrangements; (g) performance of services, membership, or fundraising solicitations; or (h) sharing of facilities, equipment, mailing lists or other assets, or paid employees?☐ Yes ☒ No

If "Yes," explain fully and identify the other organizations involved.

**7** Is the organization financially accountable to any other organization?☐ Yes ☒ No

If "Yes," explain and identify the other organization. Include details concerning accountability or attach copies of reports if any have been submitted.

0000 0000 1799

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**Part II** Activities and Operational Information (Continued)

8. What assets does the organization have that are used in the performance of its exempt function? (Do not include property producing investment income.) If any assets are not fully operational, explain their status, what additional steps remain to be completed, and when such final steps will be taken. If "None," indicate "N/A."

N/A

- 9a. Will any of the organization's facilities or operations be managed by another organization or individual under a contractual agreement?

☐ Yes☒ No

- b. Is the organization a party to any leases?

☐ Yes☒ No

- If either of these questions is answered "Yes," attach a copy of the contracts and explain the relationship between the applicant and the other parties.

10. Is the organization a membership organization?

☒ Yes☐ No

If "Yes," complete the following:

- a. Describe the organization's membership requirements, and attach a schedule of membership fees and dues.

The only membership requirement is that the individual be of good reputation. There are no set fees or dues. Rather, any contribution regardless of size is accepted.

- b. Describe your present and proposed efforts to attract members, and attach a copy of any descriptive literature or promotional material used for this purpose. Please see attached sheet.

- c. What benefits do (or will) your members receive in exchange for their payment of dues?

Members will not receive any monetary benefits from their payment of dues. Rather, they will be doing acts of good deeds. They will be bettering the lives of other people and can feel better about themselves for helping others.

- 11a. If the organization provides benefits, services or products, are the recipients required, or will they be required, to pay for them?

☒ N/A☐ Yes☐ No

If "Yes," explain how the charges are determined, and attach a copy of your current fee schedule.

- b. Does or will the organization limit its benefits, services or products to specific individuals or classes of individuals?

☒ N/A☐ Yes☐ No

If "Yes," explain how the recipients or beneficiaries are or will be selected.

12. Does or will the organization attempt to influence legislation?

☐ Yes☒ No

If "Yes," explain. Also, give an estimate of the percentage of the organization's time and funds which it devotes or plans to devote to this activity.

13. Does or will the organization intervene in any way in political campaigns, including the publication or distribution of statements?

☐ Yes☒ No

If "Yes," explain fully.



0000 0000 1800

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**Part III** Technical Requirements

- 1 Are you filing Form 1023 within 15 months from the end of the month in which you were created or formed? ☒ Yes ☐ No  
If you answer "Yes," do not answer questions 2 through 6.

- 2 If one of the exceptions to the 15-month filing requirement shown below applies, check the appropriate box and proceed to question 7.

Exceptions—You are not required to file an exemption application within 15 months if the organization:

- ☐ (a) is a church, interchurch organization, local unit of a church, a convention or association of churches, or an integrated auxiliary of a church;
- ☐ (b) is not a private foundation and normally has gross receipts of not more than \$5,000 in each tax year; or
- ☐ (c) is a subordinate organization covered by a group exemption letter, but only if the parent or supervisory organization timely submitted a notice covering the subordinate.

- 3 If you do not meet any of the exceptions in question 2, do you wish to request relief from the 15-month filing requirement? ☐ Yes ☐ No

- 4 If you answer "Yes" to question 3, please give your reasons for not filing this application within 15 months from the end of the month in which your organization was created or formed. (See the Instructions before completing this item.)

- 5 If you answer "No" to both questions 1 and 3 and do not meet any of the exceptions in question 2, your qualification as a section 501(c)(3) organization can be recognized only from the date this application is filed with your key District Director. Therefore, do you want us to consider your application as a request for recognition of exemption as a section 501(c)(3) organization from the date the application is received and not retroactively to the date you were formed? ☐ Yes ☐ No

- 6 If you answer "Yes" to question 5 above and wish to request recognition of section 501(c)(4) status for the period beginning with the date you were formed and ending with the date your Form 1023 application was received (the effective date of your section 501(c)(3) status), check here ☐ and attach a completed page 1 of Form 1024 to this application.

0000 0000 1801

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**Part III Technical Requirements (Continued)**

7 Is the organization a private foundation?

- ☐ Yes (Answer question 8.)
- ☒ No (Answer question 9 and proceed as instructed.)

8 If you answer "Yes" to question 7, do you claim to be a private operating foundation?

- ☐ Yes (Complete Schedule E)
- ☐ No

After answering this question, go to Part IV.

9 If you answer "No" to question 7, indicate the public charity classification you are requesting by checking the box below that most appropriately applies:

**THE ORGANIZATION IS NOT A PRIVATE FOUNDATION BECAUSE IT QUALIFIES:**

- (a) ☐ As a church or a convention or association of churches (CHURCHES MUST COMPLETE SCHEDULE A). Sections 509(a)(1) and 170(b)(1)(A)(i)
- (b) ☐ As a school (MUST COMPLETE SCHEDULE B). Sections 509(a)(1) and 170(b)(1)(A)(ii)
- (c) ☐ As a hospital or a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital (MUST COMPLETE SCHEDULE C). Sections 509(a)(1) and 170(b)(1)(A)(iii)
- (d) ☐ As a governmental unit described in section 170(c)(1). Sections 509(a)(1) and 170(b)(1)(A)(v)
- (e) ☐ As being operated solely for the benefit of, or in connection with, one or more of the organizations described in (a) through (d), (g), (h), or (i) (MUST COMPLETE SCHEDULE D). Section 509(a)(3)
- (f) ☐ As being organized and operated exclusively for testing for public safety. Section 509(a)(4)
- (g) ☐ As being operated for the benefit of a college or university that is owned or operated by a governmental unit. Sections 509(a)(1) and 170(b)(1)(A)(iv)
- (h) ☐ As receiving a substantial part of its support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public. Sections 509(a)(1) and 170(b)(1)(A)(v)
- (i) ☒ As normally receiving not more than one-third of its support from gross investment income and more than one-third of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions). Section 509(a)(2)
- (j) ☐ We are a publicly supported organization but are not sure whether we meet the public support test of block (h) or block (i). We would like the Internal Revenue Service to decide the proper classification. Sections 509(a)(1) and 170(b)(1)(A)(vi) or Section 509(a)(2)

If you checked one of the boxes (a) through (f) in question 9, go to question 14.

If you checked box (g) in question 9, go to questions 11 and 12.

If you checked box (h), (i), or (j), go to question 10.



Form 872-C (Rev. 9-90)

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You must complete this form and attach it to your application if you checked box (h), (i), or (j) of Part III, question 9, and you have not completed a tax year of at least 8 months.

For example: If you incorporated May 15 and your year ends December 31, you have completed a tax year of only 7½ months. Therefore, Form 872-C must be completed.

(a) Enter the name of the organization. This must be entered exactly as it is written in the organizing document. Do not use abbreviations unless the organizing document does.

(b) Enter the current address.

(c) Enter ending date of first tax year.

For example:

(a) If you were formed on June 15 and you have chosen December 31 as your year end, enter December 31, 19.....

(b) If you were formed June 15 and have chosen June 30 as your year end, enter June 30, 19..... In this example your first tax year consists of only 15 days.

(d) The form must be signed by an authorized officer or trustee, generally the President or Treasurer.

(e) Enter the date that the form was signed.

DO NOT MAKE ANY OTHER ENTRIES.



Form **872-C**

(Revised 9-90)

Department of the Treasury  
Internal Revenue Service**Consent Fixing Period of Limitation Upon  
Assessment of Tax Under Section 4940 of the  
Internal Revenue Code**

(See instructions on reverse side.)

OMB No. 1545-0048  
MAY 1991 EDITIONTo be used with Form  
1023. Submit in  
duplicate.

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an advance ruling period,

**Benevolence International Foundation**

(Exact legal name of organization as shown in organizing document)

**c/o Salimah H. Khudaira, 7810 S. Mayfield Ave.**

(Number, street, city or town, state, and ZIP code)

**Burbank, IL 60459**

and the

District Director of  
Internal Revenue, or  
Assistant Commissioner  
(Employee Plans and  
Exempt Organizations)

Consent and agree that the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year: **December 31, 1992**

(Month, day, and year)

Name of organization (as shown in organizing document)

**Benevolence International Foundation**Date: **9/18/92****11/5/92**

Officer or trustee having authority to sign

Signature: **X**

For IRS use only

District Director or Assistant Commissioner (Employee Plans and Exempt Organizations)

**22****Group Manager, 7209**By: **X**

For Paperwork Reduction Act Notice, see page 1 of the Form 1023 instructions.

Form **8718**  
(Rev. October 1990)  
Department of the Treasury  
Internal Revenue Service

**User Fee for Exempt Organization  
Determination Letter Request**  
▶ Attach this form to determination letter application.  
(Form 8718 is NOT a determination letter application)

IRS Use Only  
Control number **544248**  
Amount paid **375**  
User fee received **375**

1 Name of organization  
**Renewance International Foundation**

2 Type of request (check only one box and include a check or money order made payable to Internal Revenue Service for the amount of the indicated fee):

- a ☐ Initial request for an exempt organization determination letter (do NOT use for a pension plan determination letter) by an organization whose annual gross receipts have not exceeded (or are not expected to exceed) \$10,000, averaged over the preceding four taxable years, or new organizations which anticipate annual gross receipts averaging not more than \$10,000 during their first four years. If you check this box you must complete the income certification below. . . . . **\$ 150**

**Certification**

**RECEIVED  
WITH REMITTANCE**

I hereby certify that the annual gross receipts of **RENEWANCE INTERNATIONAL FOUNDATION** have not exceeded (or are not expected to exceed) \$10,000, averaged over the preceding four (or first four) years of operation.

Signature **[Signature]** Title **Director**

- b ☒ Initial request for an exempt organization determination letter (do NOT use for a pension plan determination letter) by an organization whose annual gross receipts have exceeded (or are expected to exceed) \$10,000, averaged over the preceding four taxable years, or a new organization which anticipates annual gross receipts averaging more than \$10,000 during their first four years. . . . . **\$ 375**
- c ☐ Private foundation which has completed a section 507 termination and which seeks a determination letter that it is now a public charity . . . . . **\$ 200**
- d ☐ Group exemption letters . . . . . **\$ 500**

**Instructions**

The Omnibus Budget Reconciliation Act of 1990 requires payment of a user fee for determination letter requests submitted to the Internal Revenue Service. The fee must accompany each request submitted to a key district office.

The fee for each type of request for an exempt organization determination letter is listed in Item 2 of this form. Check the block that describes the type of request you are submitting, and attach this form to the front of your request form along with a check or money order for the amount indicated. Make the check or

be sure that your application is sent to the applicable address shown below. These addresses supersede the addresses listed in Publication 557 and all application forms.

If entity is in this IRS District  
▼

Albany, Augusta, Boston, Brooklyn, Buffalo, Burlington, Hartford, Manhattan, Portsmouth, Providence

Baltimore, District of Columbia, Pittsburgh, Richmond, Newark

Send fee and request for determination letter to this address  
▼

Internal Revenue Service EP/EO Division P. O. Box 1650, GPO Brooklyn, NY 11202

Internal Revenue Service EP/EO Division P. O. Box 17010

Albuquerque, Austin, Cheyenne, Dallas, Denver, Houston, Oklahoma City, Phoenix, Salt Lake City, Wichita

Atlanta, Birmingham, Columbia, FL, Greensboro, Jacksonville, Jacksonville, Little Rock, Nashville, New Orleans

Anchorage, Boise, Las Vegas, Los Angeles, Honolulu, Portland, Laguna Niguel, San Jose, Seattle

Sacramento

Internal Revenue Service EP/EO Division Mail Code 4550 DAL 1100 Commerce Street Dallas, TX 75242

Internal Revenue Service EP/EO Division P.O. Box 941 Atlanta, GA 30370

Internal Revenue Service EO Application Receiving Room 3127, P. O. Box 486 Los Angeles, CA 90053-0486

Internal Revenue Service

**DALTON & DALTON, P.C.** 2-92  
7912 S. AUSTIN  
BURBANK, IL 60459

**STATE BANK OF COUNTRYSIDE**  
COUNTRYSIDE, IL 60525  
70-2421-719

**1746**

PAY TO THE  
ORDER OF

**Internal Revenue Service**

**\$375-**

**Three hundred seventy five and 00/100**

**DOLLARS**

MEMO

**Renewance Intern'l Foundation**

**Tracy S. Dalton**

001746 0071924212173627300



Form 990 (1993)

## BENEVOLENCE INT'L FOUNDATION

FIN: 36-3823186

Y/E: 4-30-94 Page 2

## Part II

Statement of  
Functional Expenses

All organizations must complete column (A). Columns (B), (C), and (D) are required for section 501(c)(3) and (4) organizations and section 4947(a)(1) nonexempt charitable trusts but optional for others. (See Instructions.)

Do not include amounts reported on line 6b, 8b, 9b, 10b, or 16 of Part I.		(A) Total	(B) Program services	(C) Management and general	(D) Fundraising
22	Grants and allocations (attach schedule) <u>Sch. 2</u> (cash \$ <u>786,521</u> noncash \$ _____)	22 786,521	786,521		
23	Specific assistance to individuals (attach schedule)	23 -	-		
24	Benefits paid to or for members (attach schedule)	24 -	-		
25	Compensation of officers, directors, etc.	25 -	-		
26	Other salaries and wages	26 30,546	15,273	15,273	N/A
27	Pension plan contributions	27 -	-		
28	Other employee benefits	28 -	-		
29	Payroll taxes	29 1,328	664	664	
30	Professional fundraising fees	30 -			
31	Accounting fees	31 -	-		
32	Legal fees	32 3,489	-	3,489	
33	Supplies	33 21,246	-	21,246	
34	Telephone	34 12,833	-	12,833	
35	Postage and shipping	35 8,858	-	8,858	
36	Occupancy	36 21,890	-	21,890	
37	Equipment rental and maintenance	37 -	-		
38	Printing and publications	38 5,792	-	5,792	
39	Travel	39 15,613	-	15,613	
40	Conferences, conventions, and meetings	40 -	-		
41	Interest <u>MISCELLANEOUS</u>	41 3,954	-	3,954	
42	Depreciation, depletion, etc. (attach schedule)	42 3,165	-	3,165	
43	Other expenses (itemize): a <u>PROMOTIONS</u>	43a 903	-	903	
b	<u>CANADA OFFICE EXPENSES</u>	43b 16,572	-	16,572	
c	<u>AUTO. EXPENSE</u>	43c 3,700	-	3,700	
d	<u>SECURITY</u>	43d 736	-	736	
e	<u>ADVERTISING</u>	43e 8,003	8,003	-	
44	Total functional expenses (add lines 22 through 43) Organizations completing columns (B)-(D), carry these totals to lines 13-15	44 945,149	810,461	134,688	

Reporting of Joint Costs.—Did you report in column (B) (Program services) any joint costs from a combined educational campaign and fundraising solicitation?

If "Yes," enter (i) the aggregate amount of these joint costs \$ 1/; (ii) the amount allocated to Program services \$ 1/; (iii) the amount allocated to Management and general \$ A; and (iv) the amount allocated to Fundraising \$ A. ☐ Yes ☒ No

## Part III. Statement of Program Service Accomplishments (See instructions.)

Describe what was achieved in carrying out the organization's exempt purposes. Fully describe the services provided; the number of persons benefited; or other relevant information for each program title. Section 501(c)(3) and (4) organizations and section 4947(a)(1) nonexempt charitable trusts must also enter the amount of grants and allocations to others.

Expenses  
(Required for 501(c)(3) and (4) organizations and 4947(a)(1) trusts; optional for others.)

a	THE ORGANIZATION AIMS AT HELPING THOSE WHO ARE IN NEED THROUGHOUT THE WORLD, INCLUDING BUT NOT LIMITED TO: THE CONSTRUCTION & OPERATION OF SCHOOLS, HOSPITALS, SCIENTIFIC INSTITUTIONS OF ALL KINDS, CULTURAL AND RELIGIOUS CENTRES, ORPHANAGES & SOCIAL SERVICE CENTERS, GUARDIANSHIP (Grants and allocations \$ _____)	
b	OF ORPHANS AND CARING FOR THE NEEDY FAMILIES WHO HAVE NO SUPPORTER, THE COMPILATION AND PRINTING OF BOOKS & TAPES OF ALL KINDS AS WELL AS THE ISSUANCE OF NEWSPAPERS, MAGAZINES AND PUBLICATIONS FOR EDUCATIONAL, CULTURAL & GUIDANCE PURPOSES. (Grants and allocations \$ _____)	810,461
c	_____ _____ (Grants and allocations \$ _____)	
d	_____ _____ (Grants and allocations \$ _____)	
e	Other program services (attach schedule) (Grants and allocations \$ _____)	
f	Total (add lines a through e) (Grants and allocations \$ _____)	810,461

PUBLICATIONS